

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:  
*Cheryl Rivelli, et al. v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD)(SN)  
*Matthew Rowenhorst, et al. v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD)(SN)

**NOTICE OF RENEWED MOTION FOR FINAL JUDGMENT AS TO LIABILITY AND  
FOR PARTIAL FINAL JUDGMENT FOR DAMAGES AGAINST THE ISLAMIC  
REPUBLIC OF IRAN FOR A HUSBAND AND WIFE WHO WERE MURDERED ON  
FLIGHT 11 ON SEPTEMBER 11, 2001 AND WHO WERE NON-U.S. NATIONALS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq. (“Goldman Declaration”), with the exhibits attached thereto, the Estates of Michael Theodoridis and Rahma Salie, husband and wife and non-U.S. National Plaintiffs in the above-referenced matters who are identified in Exhibit A to the Goldman Declaration (which is Exhibit B to the Proposed Order), who were killed on Flight 11 on September 11, 2001 and whose prior motion for solatium judgments were denied without prejudice at ECF No. 9931, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an ORDER:

- (1) entering a judgment as to liability for the Estates of Michael Theodoridis and Rahma Salie for their common law claims against the Islamic Republic of Iran (“Iran”);<sup>1</sup> AND,

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<sup>1</sup> The Court previously determined that (i) service of process in the above-captioned matters was properly effected upon Iran in accordance with 28 U.S.C. § 1608(a) for sovereign defendants, (ii) the Court has subject-matter jurisdiction over the common law claims of non-U.S. national plaintiffs pursuant to 28 U.S.C. § 1605B, and (iii) that this Court has subject-matter jurisdiction over Iran under the common law for actions arising out of intentional infliction of emotional distress based on the intentional acts of international terrorism perpetrated on September 11, 2001 that intentionally targeted innocent civilians resulting in significant grief sustained by family members of those killed in the attacks. See ECF No. 9931 at 7.

- (2) finding Iran jointly and severally liable with the Taliban and awarding the Estates of Michael Theodoridis and Rahma Salie damages judgments against Iran in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer, O'Neill*, and other cases; AND,
- (3) awarding intentional infliction of emotional distress (solatium) damages to the Estates of Michael Theodoridis and Rahma Salie in the amount of \$12,500,000 per spouse, as set forth in Exhibit A; AND,
- (4) awarding the Estates of Michael Theodoridis and Rahma Salie prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages; AND,
- (5) granting the Estates of Michael Theodoridis and Rahma Salie permission to seek punitive damages, economic damages, and other appropriate damages, at a later date; AND,
- (6) granting permission for all other Plaintiffs in these actions not appearing in Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; AND,
- (7) granting to the Estates of Michael Theodoridis and Rahma Salie such other and further relief as this honorable court deems just and proper.

Dated: New York, New York  
August 29, 2024

Respectfully submitted,

/s/ Jerry S. Goldman

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